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November 19, 2020

***Via ECF***

Honorable Loretta A. Preska  
United States District Judge  
United States Courthouse  
500 Pearl Street  
New York, NY 10007

Plaintiff's request to file  
Dr. Chiu's unredacted expert  
report under seal is GRANTED.  
**SO ORDERED.**

Dated: November 20, 2020  
New York, New York

*Re: Laureano v. City of New York*, No. 17 Civ. 181.

  
LORETTA A. PRESKA, U.S.D.J.

Your Honor:

We represent Plaintiff Suhail Laureano and write with consent of all parties to respectfully request, pursuant to Rule 2(H) of the Court's Individual Practices in Civil Cases, that the Court grant leave to file under seal the unredacted expert report of Dr. Elaine J. Chiu, M.D., Ph.D, which is attached as Exhibit A to Plaintiff's Memoranda of Law in Opposition to Defendants' motions *in limine*.

Dr. Chiu's report includes excerpts of Eliezer Lopez's medical records, which have been deemed confidential and must be filed under seal pursuant to the Protective Order entered into by the parties in this case. Dkt # 21. Plaintiff has redacted Mr. Lopez's medical records from Dr. Chiu's report in the version of the report filed on the public docket.

Accordingly, Plaintiff seeks leave to file Dr. Chiu's unredacted expert report under seal.

Respectfully Submitted

/s/  
Earl S. Ward, Esq.

c.: All Counsel (by ECF)